

Appln. No. 10/003,791  
Amendment dated Dec. 14, 2005  
Reply to Office Action of Sep. 14, 2005  
Docket No. DE9-2000-0033 (268)

### **REMARKS/ARGUMENTS**

These remarks are submitted in response to the Office Action of September 14, 2005 (Office Action). As this response is timely filed before the expiration of the 3-month shortened statutory period, no fee is believed due.

The Drawings were objected to as failing to comply with 37 C.F.R. 1.84 (p)(5) by including in FIG. 2 a reference character not mentioned in the description. Applicants have amended the Specification to overcome the Examiner's rejection by numbering the element previously described but unnumbered in the Specification, the numbering provided corresponding to the number of element shown in FIG. 2. Accordingly, withdrawal of the objection to the drawings is respectfully requested.

In paragraphs 2-3 of the Office Action, Claims 1-10, and 17-21 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,636,831 to Profit, Jr., *et al.* (hereinafter Profit). Claims 11-13 and 22-24 were rejected under 35 U.S.C. § 103(a) in paragraphs 4-5 of the Office Action as being unpatentable over Profit in view of U.S. Patent No. 5,960,399 to Barclay, *et al.* (hereinafter Barclay). Claims 14 and 25 were rejected under 35 U.S.C. § 103(a) in paragraph 8 of the Office Action as being unpatentable over Profit in view of Barclay and further in view of U.S. Patent No. 6,424,945 to Sorsa (hereinafter Sorsa). Claims 15 and 26 were rejected under 35 U.S.C. § 103(a) in paragraph 9 of the Office Action as being unpatentable over Profit in view of Barclay and further in view of Borges, *et al.* "Speech Browsing the World Wide Web" (hereinafter Borges). Claims 16 and 27 were rejected under 35 U.S.C. § 103(a) in paragraph 10 of the Office Action as being unpatentable over Profit in view of Barclay and Borges and further in view of U.S. Patent No. 6,539,359 to Ladd, *et al.* (hereinafter Ladd).

Appln. No. 10/003,791  
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Docket No. DE9-2000-0033 (268)

## **I. Applicants' Invention**

It may be useful to reiterate certain aspects of Applicant's invention prior to addressing the cited references. One embodiment of the invention, as typified by independent Claim 1, is a client system for gathering information via a network using voice input. The client system can include a speech recognition engine that is installed on the client system. Additionally, the client system can include a communication component, also installed on the client system, that is configured to establish communications with a communication component on a server system. The communication component can provide the client system access to information stored on the server. The client system can further include a voice navigation component that is configured to provide information-dependent grammars to the speech recognition engine installed on the client system. The information-dependent grammars can be provided to the speech recognition engine from the server via the communication component based on initial information loaded from the server to the client and configured to process results of the speech recognition system.

## **II. The Claims Define Over The Prior Art**

As already noted, independent Claims 1, 7, 8 and 19 were rejected as anticipated by Profit. Profit is directed to a system and process for "voice-controlled" information retrieval using a "low bandwidth, speech-oriented connection." (See Col. 2, lines 43-47; see also Abstract.) The system in Profit includes a "server suite" that provides, in addition to "standard network functionality," "conversation templates" that each comprise "tagged instructions expressed in a speech markup language." (Col. 7, lines 27-43; see also FIG. 3.) The templates in Profit are provided to another component of the system, a voice transceiver that includes both a transceiver suite and a speech engine, which

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Amendment dated Dec. 14, 2005  
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Docket No. DE9-2000-0033 (268)

together execute the conversation templates. (Col. 7, lines 44-49; see also FIGS. 4 and 8.)

Applicants respectfully submit that Profit fails to teach, either expressly or inherently, every feature recited in the independent claims. For example, Profit fails to expressly or inherently teach a client system that includes a speech recognition engine installed on the client system, as recited in each of the independent claims. A system according to Profit includes a speech engine, but the speech engine is not part of the client system.

Instead, the speech engine in Profit resides on the voice transceiver described above. Profit makes explicit that the voice transceiver, and accordingly the speech engine residing thereon, is entirely distinct from a client system: "[e]ach client 28 operates autonomously from each other client 28 *and the voice transceiver 76.*" (Col. 9, lines 41-42.) (emphasis supplied.) Profit further states that "[t]he voice transceiver 76 is not normally equipped with a display and is therefore limited to presenting only speech content." (Col. 9, lines 42-45.) Thus, in Profit, the client system does not include a speech engine; the speech engine is entirely separate from the client system.

Profit's divorcing of the speech engine from the client is further underscored by the figures. The voice transceiver, on which the voice transceiver suite and speech engine both reside, is separated from the client system and only communicates with the client by the sending of "a remote method invocation (RMI) message." (See FIG. 4, elements 28, 76, 80, and 124.) Profit's explicit divorcement of the speech engine from the client precludes any inference that Profit teaches, even inherently, a client system having a speech engine installed on the client system, as recited in each of the independent claims.

Profit further fails to expressly or inherently teach a method or client system in which information-dependent grammars are provided to a speech recognition engine from a server via a voice navigation component. In a portion cited in the Office Action, Profit

Appln. No. 10/003,791  
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Docket No. DE9-2000-0033 (268)

describes an applet that causes a browser to send a "normal HTTP request to the server" in response to an RMI message. This is commonly understood to pertain to the serving of Browser WEB content, in the HTML format. Moreover, the RMI message in Profit operates as a call received from the voice transceiver. It has nothing to do with client-server communications nor is it triggered by the client when an initial loading is done; it does not encompass initial information loaded from the server to the client, as recited in each of the independent claims. Accordingly, this action has nothing to do with information-dependent grammars, let alone ones provided to a speech recognition engine from a server via a voice navigation component as recited in each of the independent claims.

In other portions cited in the Office Action, Profit describes the execution of conversation templates and an applet's "control" of "information viewed on a browser." (Col. 7, lines 44-48, and Col 9, lines 53-63.) As already noted, however, information-dependent grammars are entirely distinct from conversational templates. In this context it should be noted, as above, that Profit explicitly states that the conversation templates comprise scripts. Scripts define program logic. By contrast, grammars provide a mechanism by which a speech recognition engine learns which words to listen for during processing.

Applicants respectfully submit, therefore, that Profit fails to teach, expressly or inherently, every feature recited in independent Claims 1, 7, 8 and 19 and that, accordingly, the claims define over the prior art. Applicants further respectfully assert that whereas each of the remaining claims depend from either Claim 1, 7, 8 and 19 while reciting additional features, each of dependent Claims 2-6, 9-10, and 18-21 likewise defines over the prior art.

Appln. No. 10/003,791  
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Docket No. DE9-2000-0033 (268)

### CONCLUSION

Applicant believes that this application is now in full condition for allowance, which action is respectfully requested. Applicant requests that the Examiner call the undersigned if clarification is needed on any matter within this Response, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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